

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re PARMALAT SECURITIES LITIGATION

This document relates to: All Cases

MASTER DOCKET
04 MD 1653 (LAK)

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**Motion for Leave to File a
Reply in Support of Dr. Bondi's Motion for a Protective Order
for His Italian Expert Witnesses**

Dr. Enrico Bondi respectfully moves for leave to file the accompanying short reply in support of his June 11, 2007 motion for a protective order.

The grounds for this motion are that:

(a) Dr. Bondi has withdrawn his designation of Franco Lagro, Oliver Galea, Roberto Megna and Stefania Chiaruttini as experts to testify in the third party action filed by Grant Thornton International and Grant Thornton LLP under docket 04 Civ. 0030 (LAK). This moots both (i) any argument by the class plaintiffs or others that they should be permitted to examine them or "make" them their witnesses and (ii) any claims that their depositions should take longer because other parties than the Grant Thornton and Bank of America defendants get to examine them in their respective actions.

(b) The parties' responses demonstrate why (i) the Court should confirm, in advance of the witnesses' depositions in New York, that their appearances here do not subject them to jurisdiction or (ii) alternatively, the Court should direct that these depositions may be held outside the U.S. unless those parties that are permitted to conduct the depositions stipulate in writing that they will not attempt to serve process on them when they are in the United States.

New York, New York
June 14, 2007

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Extraordinary Commissioner of Parmalat Finanziaria
S.p.A., Parmalat S.p.A. and other affiliated entities in
Extraordinary Administration under the laws of Italy